

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN**

In re	)	
	)	Chapter 9
	)	
CITY OF DETROIT, MICHIGAN,	)	Case No. 13-53846
	)	
Debtor.	)	Hon. Steven W. Rhodes
	)	
_____	)	<b>Expedited Consideration Requested</b>

**JOINT *EX PARTE* MOTION OF SYNCORA AND  
THE CITY OF DETROIT FOR SHORTENED NOTICE AND  
EXPEDITED HEARING ON MOTION FOR ADJOURNMENT**

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Syncora<sup>1</sup> and the City submit this joint *ex parte* motion (this “Motion”) for shortened notice and expedited hearing on the Joint Motion of Syncora and the City of Detroit for Adjournment of the Hearing (the “Motion for Adjournment”) and respectfully represent as follows:

**Jurisdiction and Venue**

1. The Court has jurisdiction over this matter under 28 U.S.C. §§ 157 and 1334. Venue is proper in this district under 28 U.S.C. §§ 1408 and 1409.

**Relief Requested and Basis for Relief**

2. Pursuant to Bankruptcy Rule 9006(c) and Local Bankruptcy Rule 9006-1(b), this Court may, *ex parte*, shorten the notice period provided by Local

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<sup>1</sup> Capitalized terms not defined herein have the meanings given to them in the Motion for Adjournment.

Bankruptcy Rule 9014-1 for a party to take any action or file any paper. Fed. R. Bankr. P. 9006(c); E.D. Mich. LBR 9006-1(b).

3. Syncora and the City respectfully request that, pursuant to Bankruptcy Rule 9006(a) and Local Bankruptcy Rule 9006-1(b), the Court shorten the notice period with respect to the Motion for Adjournment and schedule an expedited hearing on the Motion for Adjournment on **September 10, 2014**.

4. Contemporaneously with the filing of this Motion, Syncora and the City filed the Motion for Adjournment. For the reasons stated in the Motion for Adjournment, Syncora and the City seek the entry of an order adjourning the hearing to consider confirmation of the City's proposed chapter 9 plan.

5. Syncora and the City will serve this Motion to the parties in the above-captioned proceedings and will provide notice of the *ex parte* order upon issuance pursuant to E.D. Mich. LBR 9006-1(b).

### **Conclusion**

WHEREFORE, Syncora and the City respectfully request that the Court enter an Order, substantially in the form attached as **Exhibit 1**, granting the relief requested in this Motion and granting such further relief as this Court deems appropriate.

Dated: September 9, 2014

Respectfully submitted,

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